

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ST. GREGORY CATHEDRAL SCHOOL	:	
and ADK QUARTER MOON, LLC, on behalf	:	
of themselves and all others similarly situated,	:	
	:	
Plaintiffs,	:	Case No. 6:12-CV-739
	:	
v.	:	
	:	
LG ELECTRONICS, INC., a South Korean	:	
corporation, and LG ELECTRONICS U.S.A.,	:	
INC., a Delaware corporation,	:	
	:	
Defendants	:	

**DEFENDANT LG ELECTRONICS U.S.A., INC.'S**  
**CONSENT MOTION TO SEAL PLAINTIFFS' AMENDED COMPLAINT**

On the afternoon of Friday, December 21, 2012, Plaintiffs filed an amended complaint in this matter (Doc. No. 22). The Amended Complaint refers to and attaches as exhibits documents produced to Plaintiff's counsel in connection with a different lawsuit, one pending in the Circuit Court of Jefferson County, Alabama (*Cottage Builders, Inc. v. LG Electronics USA, Inc., et al.*, Case No. CV-2011-903505), in which counsel for Defendants here are not involved. It appears that at least some of the documents attached to the Amended Complaint were inadvertently produced in *Cottage Builders* without a confidential designation. This material nevertheless includes confidential and proprietary information of LG Electronics U.S.A., Inc. ("LGE USA") and its corporate affiliates.

On December 26, 2012, counsel for LGE USA in *Cottage Builders* notified Plaintiffs' Counsel of this inadvertent production. On the same day, counsel for LGE USA in *Cottage Builders* also filed a motion in *Cottage Builders* requesting that they be allowed to designate this

inadvertently produced material as confidential pursuant to the terms of the protective order entered in *Cottage Builders*.<sup>1</sup>

Following discussions among counsel in this case, the parties have agreed to request that the Court enter an order sealing the Amended Complaint and its exhibits. The parties therefore request that the Court enter an order directing the clerk to seal the Amended Complaint and its exhibits and to keep the Amended Complaint and exhibits confidential. A proposed order granting this request is attached as Exhibit A.

DATED this 27th of December, 2012.

Respectfully submitted,

/s/ Jonathan Chally  
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***COUNSEL FOR LG ELECTRONICS U.S.A., INC.***

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<sup>1</sup> This protective order was attached to Plaintiffs' Amended Complaint (Doc. No. 22-4.).

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Plaintiffs,	:	Case No. 6:12-CV-739
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corporation, and LG ELECTRONICS U.S.A.,	:	
INC., a Delaware corporation,	:	
	:	
Defendants	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I electronically filed **DEFENDANT LG ELECTRONICS U.S.A., INC.'S CONSENT MOTION TO SEAL PLAINTIFFS' AMENDED COMPLAINT** with the clerk of court for the United States District Court, Eastern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

Dated: December 27, 2012

*/s/ Jonathan Chally* \_\_\_\_\_  
Jonathan Chally

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	:	
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**CERTIFICATE OF CONFERENCE**

I hereby certify that, in connection with LG Electronics U.S.A., Inc.'s consent motion to seal Plaintiffs' Amended Complaint, counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and this motion is unopposed.

Dated: December 27, 2012

/s/ Jonathan Chally \_\_\_\_\_  
Jonathan Chally